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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SCOTT ALLAN, an individual,

Plaintiff,

vs.

PROGRESSIVE NORTHERN INSURANCE
COMPANY dba PROGRESSIVE INSURANCE;
DOES I through X, inclusive; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case No: 2:22-cv-01424-GMN-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(First Request)**

Defendant PROGRESSIVE NORTHERN INSURANCE COMPANY, and Plaintiff

SCOTT ALLAN, through their respective counsel submit the foregoing stipulation and order to
extend discovery deadlines pursuant to LR 26-4 as follows:

1. Summary of Discovery Completed

To date, the following discovery has been completed in this case:

Item	Date Completed
Plaintiff's Initial Rule 26(a) Disclosures	10/06/2022
Defendant's Initial Rule 26(a) Disclosures	11/09/2022

2. Discovery Remaining

The following discovery remains to be completed:

- a) Written Discovery to be propounded by all parties;
- b) Deposition of Plaintiff;
- c) Deposition of Person(s) Most Knowledgeable for Defendant;

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- d) Deposition(s) of percipient witnesses;
- e) Deposition(s) of treating physicians;
- f) Disclosure of expert witnesses; and
- g) Deposition(s) all expert witnesses.

3. Reason Why Discovery Was Not Completed

Discovery in this matter is currently scheduled to close on February 22, 2023 with initial expert disclosures currently due by Dec. 23, 2022. Although discovery has diligently progressed since the Scheduling Order was filed on October 6, 2022, discovery has been delayed due to counsel for Defendants having recently been preparing for and in trial. Due to limitations with Counsel's schedule, additional time is needed to conduct depositions and additional discovery prior to retaining and disclosing expert witnesses. As such, the parties believe that good cause exists to justify extending the discovery deadlines and hereby request a 60 day extension of the discovery deadlines to allow for additional time to complete the remaining discovery.

4. Proposed Schedule for Completing Discovery

Accordingly, the parties respectfully request that this Court enter an order setting the following discovery plan and scheduling order dates:

Event	Former Deadline	New Deadline
Amend pleadings or add parties	November 24, 2022	No Extension Requested
Expert Designations	December 23, 2022	February 21, 2023
Rebuttal Expert Designations	January 23, 2023	March 24, 2023
Discovery Cut-off	February 22, 2023	April 24, 2023
Dispositive Motions	March 24, 2023	May 23, 2023
Joint Pre-Trial Order	April 22, 2023	June 21, 2023

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Counsel further state that the requested extension of discovery deadlines is not interposed for purposes of delay, but rather for the purposes set forth above.

DATED: November 29th, 2022

DATED: November 29th, 2022

ERIC ROY LAW FIRM

BARRON & PRUITT, LLP

By: /s/ Stephen Lewis
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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: November 29, 2022

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